Exhibit D
Schwartz Affirmation

FILED: NEW YORK COUNTY CLERK 06/01/2023 04:26 PM INDEX NO. 652599/2023
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SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

CARLYLE AVIATION MANAGEMENT LIMITED, ACCIPITER INVESTMENTS AIRCRAFT 4 LIMITED, VERMILLION AVIATION (TWO) LIMITED, ACCIPITER HOLDINGS DAC, MAVERICK AVIATION HOLDINGS LTD., MANCHESTER AVIATION FINANCE S.à r.l., WELLS FARGO TRUST COMPANY, N.A., not in its individual capacity but solely in its capacity as OWNER TRUSTEE, UMB BANK, N.A., not in its individual capacity but solely in its capacity as OWNER TRUSTEE, Plaintiffs, v. FRONTIER AIRLINES, INC., Defendant.	Index No.: **AFFIRMATION OF JED M. SCHWARTZ IN SUPPORT OF ORDER TO SHOW CAUSE**

JED M. SCHWARTZ, an attorney duly admitted to practice law before the courts of the State of New York, hereby affirms under penalties of perjury, pursuant to N.Y. C.P.L.R. Section 2106:

1. I am not a party to this action and I am 18 years of age or older. I am a member of the Bar of the State of New York.

2. I am a Partner with the law firm Milbank LLP, located at 55 Hudson Yards, New York, New York 10001, counsel for Plaintiffs in this action.

3. I am familiar with the facts set forth in this Affirmation, which I submit in support of Plaintiffs' proposed Order to Show Cause, whereby Plaintiffs seek an order, pursuant to N.Y. Comp. Codes R. & Regs. tit. 22, § 216.1(a): (i) sealing the unredacted version of the Complaint; (ii) ordering that the Clerk of Court shall not grant access to the unredacted Complaint to anyone

other than the parties, their respective attorneys, and court personnel; and (iii) permitting the public filing of the redacted version of the Complaint, annexed hereto as **Exhibit A**.

4. The proposed order to show cause seeks to seal certain information contained in the Complaint (the "Redacted Information"). The Redacted Information includes references to certain price terms of pending sales and financings with third parties and the proceeds certain Plaintiffs would obtain from such transactions. This information is confidential pursuant to purchasing agreements and financing agreements executed between certain Plaintiffs and third parties. The Redacted Information is therefore highly sensitive and confidential business information pertaining to ongoing business transactions with third parties.

5. Therefore, Plaintiffs seek an order permitting the Redacted Information contained in the Complaint to be sealed.

6. No prior application for the relief sought herein has been made by Plaintiffs.

Dated: May 26, 2023
New York, New York

Jed M. Schwartz

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CERTIFICATION

I, Jed M. Schwartz, hereby certify that the foregoing Affirmation complies with Rule 17 of the Commercial Division Rules in that it contains 297 words and therefore does not exceed the 7,000 word count limit.

Dated: May 26, 2023
New York, New York

Jed M. Schwartz